

MICHAEL J. IOANNOU (SBN 95208)
 KEVIN W. ISAACSON (SBN 281067)
 PAULA B. NYSTROM (SBN 329651)
 AMANDA M. OGATA (SBN 354967)
 ROPERS MAJESKI PC
 333 W. Santa Clara St., Suite 930
 San Jose, CA 95113
 Telephone: 408.287.6262
 Facsimile: 408.918.4501
 Email: michael.ioannou@ropers.com
 kevin.isaacson@ropers.com
 paula.nystrom@ropers.com
 amanda.ogata@ropers.com

Attorneys for Defendants and Counterclaimants
 ANALOG DEVICES, INC. and
 MAXIM INTEGRATED PRODUCTS, INC.

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA

NUMBER 14 B.V.,

Plaintiff,

v.

ANALOG DEVICES, INC.; and MAXIM
 INTEGRATED PRODUCTS, INC.

Defendants.

ANALOG DEVICES, INC.; and MAXIM
 INTEGRATED PRODUCTS, INC.,

Counterclaimants,

v.

NUMBER 14 B.V., RUDY ESCHAUZIER,
 and NICO VAN RIJN,

Counter-Defendants.

Case No.: 5:24-cv-02435-EKL

**DECLARATION OF JULIE FITTON
 SUPPORT OF DEFENDANTS AND
 COUNTERCLAIMANTS' MOTION TO
 RETAIN CONFIDENTIALITY**

Date: May 14, 2025
 Time: 11:00 a.m.
 Dept: Courtroom 5, 4th Floor
 Judge: Hon. Nathanael Cousins

I, Julie Fitton, declare as follows:

1. I am employed at Analog Devices Inc. ("ADI") as the Chief Information Security
 Officer and hereby submit this Declaration in support of Defendants/Counterclaimants' Motion to
 Retain Confidentiality. I have personal knowledge of the facts set forth herein, and if called as a

1 witness, could and would testify competently hereto.

2 2. As the Chief Information Security Officer, I have personal knowledge with how
3 ADI handles data retention and the internal policies in place regarding data retention.

4 3. I am informed that ADI's data retention policy was produced to Number 14 in
5 response to Number 14's Requests for Production, labelled with the production number of
6 ADI_018935-018938 (the "Data Retention Policy").

7 4. I am informed that the Data Retention Policy is referenced in ADI/Maxim's
8 Motion to Retain Confidentiality.

9 5. ADI's Data Retention Policy is an internal document that contains ADI's
10 classification and retention of data.

11 6. Disclosure of the Data Retention Policy would be specifically prejudicial to ADI
12 in forthcoming legal proceedings.

13 7. Revealing this information would give ADI's competitors an unfair advantage by
14 providing access to sensitive internal policies. This information could potentially be used in
15 future litigation against ADI.

16 8. Competitors could then exploit ADI's internal policies without having to invest the
17 same time and resources that ADI dedicated to developing them.

18 9. Similarly, disclosure of the Data Retention Policy would be specifically prejudicial
19 to ADI since it provides an understanding regarding how long certain data is retained or how it is
20 processed, so competitors could reverse-engineer or exploit weaknesses in data retention
21 strategies for their own advantage.

22 10. The Data Retention Policy is considered sensitive information within the company
23 and it is not available to the public.

24 11. Limiting any and all disclosure of the Data Retention Policy is necessary to protect
25 ADI's business interests, security interests, and competitive standing in the marketplace.

26 ///

27 ///

28 ///

1 I declare under penalty of perjury under the laws of the United States of America that the
2 foregoing is true and correct.

3 Executed this 24 day of March, 2025 at Wilmington (city), MA (state).

4
5 
6 JULIE FITTON
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28